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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD C. WOJEWODZKI,	:	CIVIL ACTION NO. 1:CV 01-285
	:	
Plaintiff	:	
	:	
v.	:	JUDGE SYLVIA H. RAMBO
	:	
CONSOLIDATED FREIGHTWAYS,	:	
INC.,	:	
	:	
Defendant	:	JURY TRIAL DEMANDED

FILED
HARRISBURG, PA

DEC 03 2001

MARY E. D'ANDREA, CL
Per g/s
Deputy Clerk

**JOINT STIPULATIONS TO ENLARGE TIME FOR CERTAIN DEPOSITIONS
AND TO CHANGE AFFECTED DATES**

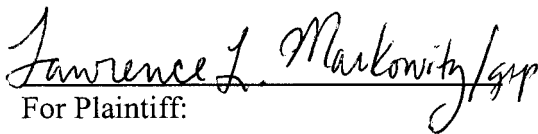
Richard C. Wojewodzki and Consolidated Freightways Corporation
stipulate the following:

1. Discovery in the above captioned case is scheduled to close on December 3, 2001.
2. On November 19, 2001, Plaintiff's counsel notified Defendant's counsel that he intended to depose Jeff Rice, James Kot, Pat Corson, Peter Ferguson, William Kudrick, and any person that directly was involved in the decision to demote Plaintiff.
3. Plaintiff's counsel's ability to work over the past several months has been circumscribed by an ongoing medical condition.
4. In light of Plaintiff's counsel's medical complications, Defense counsel agrees that discovery in this matter should be extended until January 11, 2002, for the limited purpose of taking the depositions of those persons named in ¶2, *supra*.

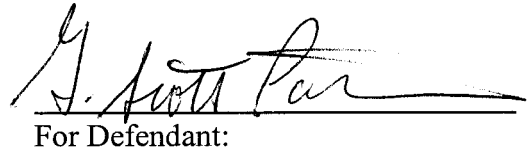
5. As a result of this extension, Plaintiff's counsel and Defense counsel agree that the following dates should be changed:

- a. Dispositive Motions due: February 1, 2002
- b. Motions in Limine: February 18, 2002
- c. Final pretrial conference: March 4, 2002
- d. Trial date: March 18, 2002

WHEREFORE, the Parties to this action respectfully request that this Court extend discovery for these specific depositions until January 11, 2002.


For Plaintiff:

Lawrence L. Markowitz, Esquire
Markowitz & Krevsky, P.C.
208 E. Market Street
P.O. Box 392
York, PA 17405-0392


For Defendant:

Vincent Candiello, Esquire
G. Scott Paterno, Esquire
One Commerce Square
417 Walnut Street
Harrisburg, PA 17101

Approval by the Court:

Sylvia H. Rambo, J.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joint Stipulation to Enlarge Time for Certain Depositions and to Change Affected Dates has been served via U.S. Mail, postage prepaid, on this **3rd day of December, 2001**, upon the following:

Lawrence L. Markowitz, Esquire
Markowitz & Krevsky, P.C.
208 E. Market Street
P.O. Box 392
York, PA 17405-0392


G. SCOTT PATERNO